

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1  
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**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
1998 Biennial Review	)	WT Docket 98-143
-Amendment of Part 97	)	RM-9148
of the Commission's	)	RM-9150
Amateur Service rules.	)	RM-9196

**COMMENTS OF:** John K. Wilson

**I: INTRODUCTION**

I file the following comments on 16 September, 1998 in the FCC's Notice of Proposed Rulemaking, WT Docket No. 98-143. I currently hold Amateur Advanced Class license KK6KU and have had varying involvement in HF, VHF and UHF radio communications on a professional and hobbyist basis for over forty years.

I have always viewed the Amateur Service, in its role as a major gateway to the worlds of technology and public service for younger citizens, as being a genuine asset for American society. It therefore follows that both the FCC and current Amateurs need to work together to ensure a healthy and productive future for the Service.

In recent decades it has become ever more painfully obvious that Ham radio is withering under the status quo imposed by long-outdated licensing criteria. As all involved are aware, this status quo has been defended with religious zeal by an entrenched segment of Amateur society who in the past seemingly held total control of the pathways to change. For these reasons I could not be happier with the FCC's initiation of this opportunity for a fresh look at the license structure.

I am, in fact, in general agreement with virtually all the FCC's suggestions but would like to add my own somewhat specific comments on those items I feel are particularly significant to the revitalization of the Amateur Service, given in my own order of perceived importance.

**II: TELEGRAPHY EXAMINATION REQUIREMENTS**

Of all the problems with the current structure of the Service in general, the fanatical level of emphasis placed on telegraphy without doubt is the most significant. Communication by HF radio is one of the most magical aspects of our technology and therefore is, or would be, a tremendously important drawing card to attract the individuals needed to return Amateur Radio to a position of significance in our technological society. As the FCC has in essence pointed out, for all it's historic and recreational attraction, telegraphy is now nothing more than one very minor aspect of radio communication and more significantly has all the technological relevance of learning some elaborate secret handshake ritual.

Based on this analysis, for basic access to the full HF band structure I would strongly suggest a reduction in required Morse proficiency to the minimum level needed to satisfy treaty requirements for so long as these requirements continue. At this point a 5wpm proficiency should earn the band access now enjoyed by the General class license holders. Higher speeds could, as now and for now, be retained for the other "incentive" class(es).

### **III: NUMBER OF LICENSE CLASSES / NOVICE LICENSE**

My own suggestion would be a reduction to three classes: Technician, General and Extra might not define the three classes precisely but are adequate as working names. This would leave us with a simple, easy to understand structure with well-defined progression opportunities. It is difficult to see the value in additional fractional differentiation such as the current Advanced/Extra. As pointed out the Novice class is now virtually "dead" and should either be offered upconversion to General or simply allowed to fade away as they expire. The Technician would be the entry level and, for the time being, remain "no-code/no HF". The General should, as indicated previously, drop to a 5wpm code requirement, combining the current General with the Tech-plus. Upon eventual elimination of the treaty requirements for Morse, the Technician should be given access to a fully representative, if limited, package of HF segments.

Other license questions and suggestions such as upscaling technical exams to compensate for the reduction in Morse proficiency and the various grandfathering matters certainly need thought and work but represent minor tweaking when compared to the changes outlined above.

### **IV: CONCLUSIONS**

If the Amateur Service in all its varied aspects has value to our society, and I would hope all agree that it does, there is without any possibility of doubt a critical and immediate need for significant changes to make it attractive to our younger citizens.

There are rational requirements which need to be met through the licensing process, primarily the need to insure a reasonable level of technical and regulatory knowledge, and secondarily the desirable goal of presenting some graduated level of challenge to applicants. Unfortunately, the second of these goals is currently addressed to a significant degree through pointless and Byzantine rituals which cannot be rationalized to or by prospective candidates. It is imperative that these be purged and replaced by requirements which promote acquisition of useful skill or knowledge.

Respectfully submitted by:

John K. Wilson, KK6KU  
4380 Knox Avenue  
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16 September 1998